

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**TANNER S. ADAM, JONATHAN L.  
ADAM, TRITEN FINANCIAL GROUP,  
LLC, and GCZ GLOBAL LLC,**

**Defendants.**

**Civil Action File No.  
1:24-cv-03774-MHC**

**JURY DEMAND**

**COMMISSION’S MOTION FOR LEAVE TO FILE  
FIRST AMENDED COMPLAINT**

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiff, the Securities and Exchange Commission (“Commission”), for the reasons set forth in its supporting memorandum of law (attached as Exhibit 1 hereto), respectfully moves the Court for leave to file its proposed First Amended Complaint (attached as Exhibit 2 hereto) in order to add Ava A. Adam, Garrett L.W. Adam, Robert S. Adam, Carrie L. Adam, Emilio F. Hinojosa, and Virginia I. Hinojosa as relief defendants, seeking disgorgement and prejudgment interest from them. Each proposed relief defendant currently resides in a home titled in their respective names that was purchased using investor funds. Additionally, the defendants used

investor funds to pay various personal expenses incurred by Ava Adam, Robert Adam, Carrie Adam, and Garrett Adam. Finally, the defendants transferred investor funds to both Ava Adam and Garrett Adam. For the convenience of the Court and the Defendants, the Commission also appends a version of the proposed First Amended Complaint which tracks all of the proposed changes from the original complaint filed August 26, 2024. (Attached as Exhibit 3 hereto).

Respectfully submitted this 21st day of March, 2025,

/s/ Kristin W. Murnahan

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COUNSEL FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of this Court using the CM/ECF system which will send notice of such filing to counsel of record.

I also certify that I sent the foregoing filing via UPS to the following counsel for Defendants:

Robert Rhatigan  
Practus, LLP  
2001 L Street, NW, Suite 500  
Washington, DC 20036

Dated: March 21, 2025

/s/ Kristin W. Murnahan  
Kristin W. Murnahan